

Exhibit 1

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

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CHMURA ECONOMICS & ANALYTICS, LLC  
Plaintiff

vs. Case No. 3:19-CV-00813

RICHARD LOMBARDO  
Defendants

~~~~~  
REMOTE VIDEO DEPOSITION OF:
CHRISTINE CHMURA, PH.D.

Taken on:
May 1, 2020
11:00 a.m.

Taken at:

McGuire Woods, LLP
Gateway Plaza
800 East Canal Street
Richmond, VA

Kelliann D. Linberg, RPR, Notary Public

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1 Q. Okay. So what occurred after you talked to
2 -- after you had your conversation with counsel, what
3 occurred next?

4 A. I believe the letter went out to Rick
5 requesting that he send back the information. I
6 believe we offered him maybe 10,000 as a severance.

7 Q. At that point, was Mr. Lombardo on unpaid
8 leave?

9 A. He was not -- I don't remember if it was
10 unpaid or not, but he certainly wasn't working. But he
11 was still -- he had not been fired yet.

12 Q. Why did Chmura decide to terminate
13 Mr. Lombardo's employment?

14 A. Well, certainly, we saw from the pattern of
15 his work relationship with us, that, one, greater
16 distrust was occurring over time. But when you get to
17 the point that someone says, "I am going to take your
18 book of business and sell it to the competition, I am
19 going to put you out of business, I am going to screw
20 you," I think any reasonable minded person would fire
21 someone at that point.

22 Q. In the days leading up to those reported
23 statements, what had occurred?

24 A. Can you be more --

25 MR. SATTERWHITE: Object to the form.